

EXHIBIT C

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

Consumer Finance Protection Bureau,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 3:17-cv-00101-RDM
)	(Hon. Robert D. Mariani)
)	
Navient Corporation, <i>et al.</i> ,)	
)	
Defendants.)	

DECLARATION OF NAVIENT SOLUTIONS, LLC

I, Nicole M. Stolba, declare as follows:

1. I am Counsel at Navient Solutions, LLC (formerly Navient Solutions, Inc. and Sallie Mae, Inc.) (“Navient Solutions”). I and other members of Navient Solutions in-house counsel provide legal services to Navient Corporation and its current subsidiaries and affiliates, including but not limited to Navient Solutions, Pioneer Credit Recovery, Inc. (“Pioneer”), and General Revenue Corporation (“GRC”). I am an attorney licensed in New York, with a law degree from the State University of New York at Buffalo School of Law.

2. Pioneer and GRC are wholly owned subsidiaries of Asset Performance Group, LLC, which is a wholly owned subsidiary of Navient Corporation (formerly SLM Corporation). Navient Solutions is a wholly owned subsidiary of Navient Corporation.

3. In accordance with my ethical obligations as an attorney, I would not undertake any joint representation—including of Navient Corporation and its current subsidiaries and affiliates—if I believed their interests to be adverse.

4. It is my understanding and expectation that with respect to any matter about which employees of Navient Corporation and its subsidiaries and affiliates communicate jointly

with Navient Solutions in-house counsel, Navient Solutions in-house counsel jointly represents Navient Corporation and its subsidiaries and affiliates.

5. I am not aware of any agreement, written or otherwise, that limits the scope of the joint representation in any way.

6. Neither Navient Corporation nor its current subsidiaries or affiliates have discharged Navient Solutions in-house counsel, nor has Navient Solutions in-house counsel withdrawn from representing them.

7. I am not aware of any circumstances, in the period from June 2009 through January 2017, from which it could be inferred that Navient Corporation and its current subsidiaries and affiliates had ceased to be jointly represented by Navient Solutions in-house counsel.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 11, 2019.



Nicole M. Stolba